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VIA ECF

June 21, 2021

The Honorable Ronnie Abrams U.S. District Court Southern District of New York 40 Foley Square New York, NY 10007-1312 Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

June 22, 2021

Re: <u>United States v. Shane Dottle, 18-Cr-00151-RA-1</u>

Dear Judge Abrams:

We represent defendant Shane Dottle in the above-referenced matter and respectfully submit this request for two modifications to Shane's bail conditions. Pretrial Services ("PTS") agrees with these modifications given Shane's continued employment and compliance with all of his existing bail conditions, and the Government does not object to this request.

The two requests for modification are as follows:

- Shane is currently subject to intensive drug outpatient treatment. Shane's outpatient counselor recommended to PTS that this condition be modified and reduced because Shane has been doing well in treatment. PTS agrees with this recommendation. We therefore jointly propose that this condition be modified from intensive drug outpatient treatment to substance abuse treatment and testing as directed by PTS; and
- Shane is currently subject to home detention enforced by electronic monitoring/GPS, with two hours of leave time per day (within a 1-2 mile radius of Shane's home). We jointly propose that this two-hour window be increased to four hours on the days that Shane is not working at his job (which typically is two days per week).

As noted above, the Government does not object to these modifications.

June 21, 2021

We thank the Court for its consideration of this matter.

Sincerely,

/s/ *Christopher LaVigne* Christopher LaVigne

CC: Jonathan Rebold, Assistant United States Attorney Rena Bolin, Pretrial Services Officer